

July 26, 2024

SUBMITTED VIA CFTC PORTAL

Secretary of the Commission
Office of the Secretariat
U.S. Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

Re: KalshiEX LLC – Amendments to the Rulebook and Member Agreement

Dear Sir or Madam,

KalshiEX LLC (“Kalshi” or “Exchange”) hereby notifies the Commodity Futures Trading Commission (“CFTC”) that it is amending its Rulebook and Member Agreement, effective on August 8, 2024.

The amendments to the Rulebook add a definition for “Clearing House” and remove references to a specific clearing house, in anticipation of an eventual change in clearing houses.

The amendments to the Member Agreement include the addition of two risk disclosures, an acknowledgement regarding changes in clearing houses, and stylistic updates to streamline the agreement.

Redlines of the Rulebook and the Member Agreement that show the amendments are attached, along with clean copies of both.

Compliance with Core Principles

Kalshi has concluded that the amendments to the Rulebook and the Member Agreement are not inconsistent with the CEA and the CFTC’s regulations. The Exchange in particular considered **Core Principles 7 and 11**, in addition to the other core principles. The Exchange has concluded that the amendment complies with the core principles. The amendments to the Rulebook and the Member Agreement are consistent with the requirement to ensure that the Commission, participants, and the public have access to accurate information. The amendments also facilitate compliance with mandatory clearing obligations.

No opposing views to the contrary have been expressed.

Kalshi accordingly certifies that the amendments to the Rulebook and the Member Agreement comply with the requirements of the Commodity Exchange Act and the rules and regulations

promulgated thereunder, and certifies that, concurrent with this filing, a copy of this submission (except for the confidential appendix) was posted on the Kalshi website and may be accessed at: <https://kalshi.com/regulatory/notices>.

If you have any questions or comments or require further information, please do not hesitate to contact me.

Sincerely,
Elie Mishory
Chief Regulatory Officer
KalshiEX LLC
emishory@kalshi.com

Enclosures:
Clean and redlined copies of the Rulebook
Clean and redlined copies of the Member Agreement